

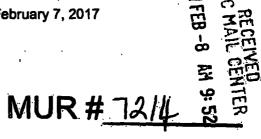
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OHIO DEMOCRATIC PART

February 7, 2017

Mr. Matthew S. Petersen, Chairman Federal Election Commission 999 E Street, NW Washington, DC 20463

Dear Mr. Petersen:



Please consider this letter a formal complaint against the Ohio Republican Party ("ORP"). As shown by the evidence enclosed with this complaint, the ORP has improperly paid for and disclosed at least \$550,000 in connection with voter identification activity in violation of FEC regulations.

According to the Columbus Dispatch, the ORP spent up to \$1 million dollars in 2014 on what they called "Project Ruby" a new voter file system used in identifying and targeting voters in connection with an election featuring federal candidates. "Kvamme to use high-tech to help Ohio GOP mine votes." Columbus Dispatch, May 29, 2014. Attached as Exhibit A. According to the Dispatch report, the ORP has retained a firm named FactGem to undertake this project. Based upon a review of reports filed with the Federal Election Commission, it is clear that the ORP is improperly paying for Project Ruby as an administrative cost. Thus, the ORP is clearly ignoring the requirements that Project Ruby be paid for as a federal election activity.

According to reports filed with the Federal Election Commission, the ORP made payments totaling \$517,500 to FactGem, reported on Schedule H4:

text OH to 27138

/OHDems

OHDems

www.ohlodems.org

| 02/21/14 | \$50,000 |
|----------|-----------|
| 05/01/14 | \$50,000 |
| 05/19/14 | \$200,000 |
| 06/20/14 | \$50,000 |
| 07/28/14 | \$50,000 |
| 09/02/14 | \$50,000 |
| 09/30/14 | \$50,000 |
| 10/30/14 | \$17,500 |

FEC Report Pages are attached as Exhibit B.

By disclosing these expenses on Schedule H4 and, presumably, allocating those expenditures with federal and non-federal funds, the ORP has violated the requirements of 2 U.S.C. § 30125(b) which require that any federal election activity either be paid for with federal funds or with a combination of federal and non-federal (i.e. "Levin) funds.

Specifically, the ORP has engaged in "voter identification" activity, which is defined as:

...acquiring information about potential voters, including, but not limited to, obtaining voter lists and creating or enhancing voter lists by verifying or adding information about the voters' likelihood of voting in an upcoming election or their likelihood of voting for specific candidates. The date a voter list is acquired shall govern whether a State, district, or local party committee has obtained a voter list within the meaning of this section.

11 C.F.R. § 100.24(a)(4).

For purposes of this section, all expenditures made between February 5, 2014 and November 6, 2014 were considered a federal election activity. See http://www.fec.gov/info/charts fea dates 2014.shtml#search=federal%20election%20activities. Since these payments were made between February 5, 2014, and November 6, 2014 the entire \$467,500 spent by the ORP was in non-compliance with Federal Election Commission requirements and in violation of federal election laws and regulations.

The only way that the ORP could have legally paid for expenses related to federal election activity were to either pay for them exclusively with federal funds, or with a combination of federal and Levin funds, which are non-federal funds raised in increments no greater than \$10,000. 11 C.F.R. § 300.33. In addition to violating section 441i(b), the ORP failed to properly disclose the payments for these activities as federal election activities in accordance with 11 C.F.R. § 300.36.

Moreover, the ORP also made additional payments directly to FactGem from non-federal accounts. Each of these payments is a violation of 11 CFR § 106.7(e)(3), which states that "only Federal funds, or a mixture of Federal funds and Levin funds, as provided in 11 CFR 300.33, may be used" to pay for federal election activities:

| 03/11/14 | \$10,000 from the Ray C. Bliss Building Trust Fund |
|----------|---|
| 03/11/14 | \$5,000 from the Ohio Republican State Central & Executive |
| | Committee State Account |
| 03/11/14 | \$10,000 from the Ohio Republican State Central and Executive |
| | Committee Restricted Fund |
| 03/20/14 | \$15,000 from the Ray C. Bliss Building Trust Fund |
| 03/20/14 | \$10,000 from the Ohio Republican State Central and Executive |
| | Committee Restricted Fund |

Copies of the finance reports showing these payments are included as Exhibit C.

The Ohio Republican State Central and Executive Committee Restricted Fund may accept up to \$10,000 per calendar year from corporations and labor unions. ORC § 3517.13(X)(1). This is separate from the ORP's "Levin Fund", which is governed by R.C. 3517.1013 and is reported as a separate account from the Restricted Fund. On information and belief, the ORP Restricted Fund did not have sufficient non-corporate contributions in 2014 to make the payments to Factgem from permissible sources. By making payments for federal election activity from ORP's Restricted Fund, the ORP converted these otherwise permissible gifts into impermissible contributions in violation of 11 CFR § 114.2(b).

The Ray C. Bliss Building Trust Fund is ORP's building fund, set up in accordance with ORC § 3517.101, and may accept up to \$10,000 per calendar year from corporations and labor unions. ORP's use of this fund to pay for federal election activity violates not only 11 C.F.R. § 300.33, but also 11 CFR § 300.35(a) which prohibits the use of a party building fund "for the purpose of influencing any candidate in any particular election for Federal office." Moreover, the ORP's use of corporate contributions in paying for federal election activity converted these otherwise permissible gifts into impermissible contributions in violation of 11 CFR § 114.2(b).

While we understand that the requirements of complying with the rules for federal election activities may be burdensome, the ORP has had more than a decade to learn how to properly pay for these activities. The Federal Election Commission must promptly investigate this misuse of non-federal funds by the ORP and require the ORP to transfer federal funds to pay for this activity in its entirety with federal funds. In addition, the Commission should assess any and all necessary penalties and fines for this clear and obvious violation of federal law.

Sincerely,

l. Zachary West

General Counsel and Deputy

Treasurer

Ohio Democratic Party

SWORN TO AND SUBSCRIBED before me this 7th day of Fabruary, 2017

Notary

BOBALD J. McTIGUE, Alternay At Law Notary Public-State of Oblo

Section 147.03 & C.

EXHIBIT A

The Columbus Dispatch

Kvamme to use high-tech to help Ohio GOP mine votes

Thursday

Posted May 29, 2014 at 12:01 AM Updated May 29, 2014 at 11:43 AM

The man who built Gov. John Kasich's privatized economic-development agency has a new project, one that not only is intended to aid the Republican governor's re-election this fall but could give Kasich a leg up on the field should he choose to run for president in 2016.

By Joe Vardon, The Columbus Dispatch

The man who built Gov. John Kasich's privatized economic-development agency has a new project, one that not only is intended to aid the Republican governor's re-election this fall but could give Kasich a leg up on the field should he choose to run for president in 2016.

Venture capitalist and JobsOhio founder Mark Kvamme and his wife, the former Megan Browning, are developing technology that can compile and sort massive amounts of information on millions of Ohio voters in a searchable database, determine which undecided or unlikely voters can be "moved" to support Republicans based on that information, decide how to allocate resources to move those voters, and track them to make sure

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they vote.

The undertaking, called Project Ruby, is being paid for by the Ohio Republican Party and will be available to candidates besides Kasich. The Ohio GOP has already paid FactGem, Megan Kvamme's company created in May of 2012, \$55,000 for its work. Documents online show Republicans budgeted nearly \$1 million for Project Ruby; Ohio GOP chairman Matt Borges told *The Dispatch* that the project would cost "hundreds of thousands of dollars."

While "micro-targeting," as it's called, is not new to political campaigns, new high-tech methods can make the difference in close elections by swinging small percentages of voters to one side. Kasich enjoys a sizable lead in polling over Democratic nominee Ed FitzGerald right now. But Kasich's 2010 victory over then-Gov. Ted Strickland was by just 77,000 votes.

No campaign in history was able to micro-target through data analytics quite like Democratic President Barack Obama's in 2012, when he spent millions to develop and implement information technology that not only helped him win key swing states such as Ohio, but also exposed massive technological deficiencies on the part of Republican nominee Mitt Romney's campaign, the Republican National Committee and Ohio Republicans.

What the Kvammes are doing in Ohio is meant to not only mitigate whatever advantage FitzGerald might have with analytics -- the Cuyahoga County executive has alums from the Obama team on his payroll -- but it comes at a time when Republicans are trying to develop technology to catch up with Democrats. If it works in Ohio this year, it could conceivably work for a Republican vying for the party's presidential nomination in two years.

"Consider Ohio a big test run for this project -- if it works, it goes national," said one Republican insider who is familiar with Project Ruby and asked to remain anonymous to discuss sensitive campaign matters.

In an interview, Borges said he first approached Mark Kvamme late in 2012 because of Kvamme's background. The California venture capitalist, whom Kasich brought to Ohio in 2011 to start JobsOhio, helped shape LinkedIn, the social promotion site for business professionals.

Kvamme, who did not return messages seeking comment, left JobsOhio on Nov. 1, 2012, about 5 1/2 months after articles of incorporation were filed for FactGem.

The company is registered to Megan Kvamme in an online filing and appears to have products and customers outside of politics. Mrs. Kvamme, whose father, Gregory Browning, was budget director for Gov. George V. Voinovich, is now spearheading Project Ruby, Borges said. Her chief technology officer at FactGem is Clark Richey, who used to work at the data firm MarkLogic, where Mark Kvamme is a board member.

"What we've built, Democrats won't have anything like it and I don't think it's been done before," Borges said. "It's a data engine that allows us to maximize our voter contact and information."

The first part of Project Ruby is the database. Dozens of data points, such as when people vote, why and for whom, are collected, often through traditional campaign methods of in-person and phone contact. Those points go into the database along with other nuggets such as consumer habits, which can be purchased.

A third source is social media, which is combed for information on undecided or infrequent voters. Kvamme's experience with LinkedIn is expected to influence that portion of the project.

All the information is used to determine pockets of "soft" voters who can be persuaded to vote for Kasich.

The project's other aspect is a mechanism to track targeted voters and make sure they vote. The Romney campaign had technology for this in 2012 -- called Project ORCA -- that failed miserably on Election Day and

cut off Republican volunteers from information they had planned to use to turn out voters in swing states such as Ohio.

FactGem has already developed an app called CanvasseR that not only is supposed to succeed where ORCA failed, but also is expected to help in the data gathering for part one of Project Ruby.

Ben LaBolt, national press secretary for the Obama campaign in 2012, said "analytics and technology" can "boost a candidate" but "can't win a campaign on their own." For instance, candidates must have enough money to reach the voters they identified through technology. Kasich has about \$8.5 million on hand compared with FitzGerald's \$1.5 million.

There also is the head start Democrats had in such analytics, which began before Obama was elected in 2008.

"Everything we do is rooted in data," said Meredith Tucker, spokeswoman for the Ohio Democratic Party, which touts the strength of a voter file that stretches back to at least the successful election of U.S. Sen. Sherrod Brown in 2006.

"Republicans have tried and failed for years to catch up to our voter file strategy, so it's no surprise that their goal again is to catch up this year. They might be able to build the infrastructure, but the competitive edge for Democrats is that we've been layering specific data onto our voter file, year in and year out, for over a decade. You can't build that overnight or in one election cycle."

jvardon@dispatch.com

@joevardon

EXHIBIT B

Image# 15970317474

SCHEDULE H4 (FEC Form 3X)

DISBURSEMENTS FOR ALLOCATED FEDERAL/NONFEDERAL ACTIVITY

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DISBURSEMENTS FOR ALLOCATED FEDERAL/NONFEDERAL ACTIVITY

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SCHEDULE H4 (FEC Form 3X)

DISBURSEMENTS FOR ALLOCATED FEDERAL/NONFEDERAL ACTIVITY

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PAGE 109 OF 123

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SCHEDULE H4 (FEC Form 3X)

DISBURSEMENTS FOR ALLOCATED FEDERAL/NONFEDERAL ACTIVITY

PAGE 128 OF 138
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| C. | Full Name (Last, First, Middle Initial) Fire Systems Professionals | Transaction | ID : H4.268954 | | Allocated Activity or Event: Administrative Fundraising Exempt | | |
| | Malling Address PO Box 243 | | | | Voter Drive Direct Candidate Support | | |
| | City | State | Zip Code | | Public Comm (ref to party only) by PAC | | |
| | Grove City | ОН | 43123 | | Allocated Activity or Event Year-To-Date | | |
| | Purpose of Disbursement: Security system - not candidate specific | | | 001 | 1288744,01 | | |
| | Activity or Event Identifier: Administrative | | | Category/ | المعمار لوجوا ، لمعمما | | |
| | | | | Туре | Date 07 28 2014 | | |
| | FEDERAL SHARE | + | NONFEDERAL | . SHARE | TOTAL AMOUNT | | |
| | 8.10 | | | 45.90 | 54.00 | | |
| SI | JBTOTAL of Allocated Federal and NonFeder | ral Activity This | Page | | | | |
| | FEDERAL SHARE | + | NONFEDERAL | SHARE | = TOTAL AMOUNT | | |
| | 8383.67 47507.43 55891.10 | | | | | | |
| | <u> من من اسب کرست سید (ایسیان سیات ۲ ایسیان سیات ک</u> | <u>محمل</u> ال | د اعب شد سایب الیب | | المساور <u>ة المساورية بالمساورية المساورية المساورية المساورية المساورية المساورية المساورية المساورية المساورية ا</u> | | |
| TC | OTAL This Period (last page for each line onl | y)(Federal sha | re to 21(a)(i) and | | are to 21(a)(ii)) TOTAL AMOUNT | | |

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SCHEDULE H4 (FEC Form 3X)

DISBURSEMENTS FOR ALLOCATED FEDERAL/NONFEDERAL ACTIVITY

PAGE 131 OF 160

| | ME OF COMMITTEE (In Full) | | | | |
|----|---|------------------|--------------------|-------------------|---|
| | HIO REPUBLICAN PARTY ST | | | ECUTIVE C | |
| A. | Full Name (Last, First, Middle Initial) CPCS | Transaction | ID : H4.271037 | | Allocated Activity or Event: Administrative Fundraising Exempt |
| | Mailing Address 1182 South Front Street | | | - | Voter Drive Direct Candidate Support |
| | City Columbus | State | Zip Code 43206 | | Public Comm (ref to party only) by PAC |
| | Purpose of Disbursement: | | 10200 | , | Allocated Activity or Event Year-To-Date |
| | Office supplies - not candidate specific Activity or Event Identifier: | | | 001 | 1406795.60 |
| | Administrative | | | Category/ Type | Date 09 02 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | SHARE | = TOTAL AMOUNT |
| | 209.58 | | | 1187.60 | 1397.18 |
| В. | Full Name (Last, First, Middle Initial) | Transaction | ID : H4.271038 | | Allocated Activity or Event: |
| | FactGem Mailing Address 2000 Auburn Dr., Suite 330 |) | | | Administrative Fundraising Exempt |
| | | | Zip Code | <u> </u> | Voter Drive Direct Candidate Support |
| | City Beachwood | State OH | 44122 | | Public Comm (ref to party only) by PAC Allocated Activity or Event Year-To-Date |
| | Purpose of Disbursement: Software license fee - not candidate specific | | | 001 | 1456795.60 |
| | Activity or Event Identifier: Administrative | | | Category/ Type | Date 09 02 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | | = TOTAL AMOUNT |
| | 7500.00 | | | 42500.00 | 50000.00 |
| c. | Full Name (Last, First, Middle Initial) Aqua Systems | Transaction | n ID : H4.271039 | | Allocated Activity or Event: X Administrative Fundraising Exempt |
| | Mailing Address 7785 E US Hwy 36 | | | | Administrative Fundraising Exempt Voter Drive Direct Candidate Support |
| | City | State | Zip Code | | Public Comm (ref to party only) by PAC |
| | Avon Purpose of Disbursement: | iN | 46123 | Γ | Allocated Activity or Event Year-To-Date |
| | office supplies - not candidate specific | | | 001 | 1456874.54 |
| | Activity or Event Identifier: Administrative | | | Category/ Type | Date 09 02 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | SHARE | = TOTAL AMOUNT |
| | 11.84 | | - 3 | 67.10 | 78.94 |
| SI | JBTOTAL of Allocated Federal and NonFede | eral Activity Th | is Page | | |
| | FEDERAL SHARE | + | NONFEDERAL | . SHARE | = TOTAL AMOUNT |
| | 7721.42 | | | 43754,70 | 51476.12 |
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SCHEDULE H4 (FEC Form 3X)

DISBURSEMENTS FOR ALLOCATED FEDERAL/NONFEDERAL ACTIVITY

PAGE 157 OF 160

| NA | ME OF COMMITTEE (In Full) | | | | p of the transfer of the trans |
|----|--|-----------------|---------------------------|-------------------|--|
| | HIO REPUBLICAN PARTY STA | | | ECUTIVE C | |
| A. | Full Name (Last, First, Middle Initial) | Transaction | n ID : H4.270992 | | Allocated Activity or Event: |
| | FactGem Mailing Address 2000 Auburn Dr., Suite 330 | | | | Administrative Fundraising Exempt |
| | | | | | Voter Drive Direct Candidate Support |
| | City | State | Zip Code | | Public Comm (ref to party only) by PAC |
| | Beachwood Purpose of Disbursement: | ОН | 44122 | | Allocated Activity or Event Year-To-Date |
| | Software license/access - not candidate spec | ific | | 001 | 1592786.91 |
| | Activity or Event Identifier: | | | لسعسعا | Design of the control |
| | Administrative | | | Category/ Type | Date 09 30 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | SHARE | = TOTAL AMOUNT |
| | 7500.00 | | | 42500.00 | 50000.00 |
| B. | Full Name (Last, First, Middle Initial) | Transaction | n ID : H4.270993 | | Allocated Activity or Event: |
| | Neopost Inc. | | | | Administrative Fundraising Exempt |
| | Mailing Address PO Box 45840 | | | | Voter Drive Direct Candidate Support |
| | City | State | Zip Code | | Public Comm (ref to party only) by PAC |
| | San Francisco | CA | 94145-084 | 0 | Allocated Activity or Event Year-To-Date |
| | Purpose of Disbursement: Postage - not candidate specific | | | 001 | 1593067.46 |
| | Activity or Event Identifier: Administrative | | | Category/ Type | Date 09 30 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | SHARE | = TOTAL AMOUNT |
| | 42.08 | | ومحريت ي سود سود | 238.47 | 280.55 |
| C. | Full Name (Last, First, Middle Initial) | Transactio | on ID : H4.270995 | | Allocated Activity or Event: |
| | Quill Corporation | | | | Administrative Fundraising Exempt |
| | Mailing Address PO Box 37600 | | | | Voter Drive Direct Candidate Support |
| | City | State | Zip Code | | Public Comm (ref to party only) by PAC |
| | Philadelphia | PA | 19101 | , | Allocated Activity or Event Year-To-Date |
| | Purpose of Disbursement: Office Supplies - not candidate specific | | | 001 | 1593151.51 |
| | Activity or Event Identifier: Administrative | | | Category/ Type | Date 09 30 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | SHARE | = TOTAL AMOUNT |
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| | 12.61 | الم | | 71.44 | 84.05 |
| S | JBTOTAL of Allocated Federal and NonFede | ral Activity Ti | his Page | | |
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SCHEDULE H4 (FEC Form 3X)

DISBURSEMENTS FOR ALLOCATED FEDERAL/NONFEDERAL ACTIVITY

PAGE 144 OF 164
FOR LINE 21a OF FORM 3X

| | ME OF COMMITTEE (IN Full) HIO REPUBLICAN PARTY STA | ATE CEN | TRAI & EY | ECUTIVE C | COMMITTEE |
|----|---|-------------------|---|-------------------|---|
| _ | Full Name (Last, First, Middle Initial) | | ID : H4.272280 | LOUTIVE | Allocated Activity or Event: |
| | FactGem | | | | Administrative Fundraising Exempt |
| | Mailing Address 2000 Auburn Dr., Suite 330 | | | | Voter Drive Direct Candidate Support |
| | City | State | Zip Code | | Public Comm (ref to party only) by PAC |
| | Beachwood | ОН | 44122 | | Allocated Activity or Event Year-To-Date |
| | Purpose of Disbursement: Software/license - not candidate specific | | | 001 | 2085006.30 |
| | Activity or Event Identifier: | | | لتتا | |
| | Administrative | | | Category/ Type | Date 10 30 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | SHARE | = TOTAL AMOUNT |
| | 2625.00 | | -0 | 14875.00 | 17500.00 |
| В. | Full Name (Last, First, Middle Initial) | Transaction | ID : H4.272341 | | Allocated Activity or Event: |
| | CMDI Mailing Address 7704 Leesburg Pike, Ste 1 | | | | Administrative Fundraising Exempt |
| | 7/04 Leesburg Pike, Ste 1 | | | | Voter Drive Direct Candidate Support |
| | City | State | Zip Code | | Public Comm (ref to party only) by PAC |
| | Falls Church | VA | 22043-262 | 25 | Allocated Activity or Event Year-To-Date |
| | Purpose of Disbursement: software/license - not candidate specific | | | 001 | 2085321.40 |
| | Activity or Event Identifier: Administrative | | | | |
| | Administrative | | | Category/ Type | Date 11 04 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | SHARE | = TOTAL AMOUNT |
| | 47,27 | | | 267.83 | 315.10 |
| C. | Full Name (Last, First, Middle Initial) | Transaction | 1D : H4.271833 | | Allocated Activity or Event: |
| | Mr Robert T. Bennett | | | | Administrative Fundraising Exempt |
| | Mailing Address 636 S Grant Ave | | | | Voter Drive Direct Candidate Support |
| | City Columbus | State | Zip Code 43206-121 | 10 | Public Comm (ref to party only) by PAC |
| | Purpose of Disbursement: | | 43200-121 | 1 | Allocated Activity or Event Year-To-Date |
| | Payroll and taxes - not candidate specific | | | 001 | 2090507.89 |
| | Activity or Event Identifier: Administrative | | | Category/ | Date 11 07 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | | = TOTAL AMOUNT |
| | 1-3-4-4-3-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4- | ب نا ا | 3 | | 4 1 - 5 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - |
| | 777.97 | للما ا | | 4408.52 | 5186.49 |
| S | UBTOTAL of Allocated Federal and NonFeder | ral Activity Th | is Page | | |
| | FEDERAL SHARE | | NONFEDERAL | . SHARE | = TOTAL AMOUNT |
| | 3450.24 | | ر ا <u>د ما در اد ما</u> در ا <u>د ما در اد ما</u> | 19551,35 | 23001.59 |
| T | OTAL This Period (last page for each line onl FEDERAL SHARE | y)(Federal sh | are to 21(a)(i) an NONFEDERAL | | nare to 21(a)(ii)) TOTAL AMOUNT |
| | -1-4-3-3-4-4-4-1-4 | 7 | | | |
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SCHEDULE H4 (FEC Form 3X)

DISBURSEMENTS FOR ALLOCATED FEDERAL/NONFEDERAL ACTIVITY

PAGE 148 OF 164
FOR LINE 21a OF FORM 3X

| | ME OF COMMITTEE (In Full) HIO REPUBLICAN PARTY ST | ATE CEN | TRAL & FX | ECUTIVE C | OMMITTEE | |
|----|--|---------------------------------|--|--|---|----------------------------|
| Ā. | Full Name (Last, First, Middle Initial) | | ID : H4.272342 | | Allocated Activity o | r Event: |
| Α. | CMDI | | | | · . | Fundraising Exempt |
| | Mailing Address 7704 Leesburg Pike, Ste 1 | | | | Voter Drive | Direct Candidate Support |
| | City Falls Church | State Zip Code VA 22043-2625 | | | Public Comm | (ref to party only) by PAC |
| | Purpose of Disbursement: | | | - | Allocated Activity | or Event Year-To-Date |
| | software/ilcense - not candidate specific | | . <u> </u> | 001 | | 2110072.65 |
| | Activity or Event Identifier: | | | | | |
| | Administrative | | | Category/ Type | Date 11 | 12 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | SHARE | = 7 | TOTAL AMOUNT |
| | 1,73 | | | 9.80 | | 11,53 |
| В. | Full Name (Last, First, Middle Initial) | Transaction | ID : H4.272256 | | Allocated Activity of | |
| | FactGem Mailing Address 2000 Auburn Dr., Suite 330 | | | | Administrative | |
| | | | | | Voter Drive | Direct Candidate Support |
| | City Beachwood | State OH | Zip Code 44122 | | | (ref to party only) by PAC |
| | Purpose of Disbursement: | | 44122 | γ | Allocated Activity | y or Event Year-To-Date |
| | Software/License - not candidate specific | | | 001 | | 2142572.65 |
| | Activity or Event Identifier: Administrative | | | Category/ | THE COLUMN | (|
| | | | | Type | Date 11 | 13 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | SHARE | = | TOTAL AMOUNT |
| | 4875.00 | | 43-4- | 27625.00 | ,,, | 32500.00 |
| C. | Full Name (Last, First, Middle Initial) | Transaction | n ID : H4.272343 | | Allocated Activity | |
| | CMDI | | | | Administrative | Fundraising Exempt |
| | Mailing Address 7704 Leesburg Pike, Ste 1 | | | | Voter Drive | Direct Candidate Support |
| | City Falls Church | State VA | Zip Code 22043-262 | | Public Comm | (ref to party only) by PAC |
| | Purpose of Disbursement: | | 22043-202 | <u>T </u> | Allocated Activity | y or Event Year-To-Date |
| | software/license - not candidate specific | | | 001 | | 2143522.65 |
| | Activity or Event Identifier: Administrative | | | Cotomonia | Bull-scatters | |
| | Valumenshag | | | Category/ Type | Date 11 | 14 2014 |
| | FEDERAL SHARE | + | NONFEDERAL | | = | TOTAL AMOUNT |
| | 142.50 | | مان در الاستوامات مان دران الاستوامات | 807.50 | | 950.00 |
| _ | UBTOTAL of Allocated Federal and NonFede | rol Activity Thi | in Page | | | |
| 3 | FEDERAL SHARE | + | NONFEDERAL | SHARE | = 1 | TOTAL AMOUNT |
| | 5019.23 | 7 | | 28442.30 | عما ل | 33461.53 |
| T | OTAL This Period (last page for each line on | ly)(Federal sh | are to 21(a)(i) an | d NonFederal sh | are to 21(a)(ii)) | |
| | FEDERAL SHARE | | NONFEDERAL | | ما استانسانسان آ | TOTAL AMOUNT |
| | | | | | 11 | |

EXHIBIT C



Ohio Secretary of State Campaign Finance Disclosure

Expenditures

| | | | | | | | Breeze Martin | Partition | |
|--------------------|---|--|-----------------------|------|-------------|---------------|---------------|---|---|
| *** | Wen Individual | Address | Kopen Type | | EXPANO VALI | - Village III | | 30 100 100 | CHIC DECITOR STATE |
| | OHIO REPUBLICAN PARTY FEDERAL ACCOUNT | 211 S FIFTH STREET COLUMBUS OH 43215 | SEMIANNUAL (JULY) | 2014 | 04/29/2014 | 220,000,00 | | STATE SHARE ADMIN | CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND |
| | OHIO REPUBLICAN PARTY FEDERAL ACCOUNT | 211 S FIFTH STREET COLUMBUS OH 43215 | SEMIANNUAL (JULY) | 2014 | 05/01/2014 | \$15,000.00 | | ALOCATION STATE SHARE SOFTWARE EXPENSES | CHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND |
| | RENAISSANCE COLUMBUS | SO N THIRD ST COLUMBUS OH 43215 | SEMIANNUAL (JULY) | 2014 | 05/09/2014 | \$11,000.00 | | FOOD BEVERAGE FUNDRAISER | OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND |
| | FACTGEM | 2000 AUBURN DRIVE. SUITE 330 BEACHWOOD OH 44122 | SEMIANNUAL (JULY) | 2014 | 03/20/2014 | \$10,000.00 | | COMPUTER SOFTWARE | OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND CUID BEGING STATE |
| | FACTGEM | 2000 AUBURN DRIVE, SUITE 330 BEACHWOOD OH 44122 | SEMIANNUAL (JULY) | 2014 | 03/11/2014 | \$10,000.00 | | SOFTWARE | CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND |
| | OHIO REPUBLICAN PARTY FEDERAL ACCOUNT | 211 S FIFTH STREET COLUMBUS OH 43215 | SEMIANNUAL (JULY) | 2014 | 04/11/2014 | \$7,213.38 | | ALLOCATION OF STATE SHARE UTILITY BILLS | CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND |
| | US POSTAL SERVICE | 4289 SAWYER RD COLUMBUS OH 43236 | SEMIANNUAL (JULY) | 2014 | 04/02/2014 | \$2,646.00 | | POSTAGE | CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND |
| | MAILFINANCE | PO BOX 45840 SAN FRANCISCO CA 94145 | SEMIANNUAL (JULY) | 2014 | 03/28/2014 | \$2,500.00 | | OFFICE EQUIPMENT | OHIO REPUBLICAN STATE CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND |
| | HANOVER INURANCE COMPANY | PO BOX 580045 CHARLOTTE NC 28258-0045 | ('INTA) SEMIANNUAL | 2014 | 03/28/2014 | \$2,248.00 | | INSURANCE PREMIUM | CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND |
| | ADVANCE PRINTING & GRAPHICS | 1349 DELASHMUT AVE COLLIMBUS OH 43212 | SEMIANNUAL (JULY) | 2014 | 03/28/2014 | \$1,339.77 | | INVITES | CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND CHICK BY STATE |
| WYRICK, WILLIAM | | % ORP 211 S 5TH ST COLUMBUS OH 43215 | SEMIANNUAL (JULY) | 2014 | 03/26/2014 | \$1,222.11 | | PAYROL & IXXES BUILDING MANAGER | CONTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND |
| WYRICK, WILLIAM | | % ORP 211 S STH ST COLUMBUS OH 43215 | SEMIANNUAL (JULY) | 2014 | 04/10/2014 | \$1,221.78 | | PAYROLL & TAXES BUILDING MANAGER | CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND |
| | AT&T MOBILITY | PO BOX 6463 CAROL STREAM IL 60197-8463 | SEMIANNUAL (JULY) | 2014 | 03/28/2014 | 5991.94 | | CELL PHONES | CENTRAL & EXECUTIVE COMMITTEE RESTRICTED FUND |

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Expenditures

Ohio Secretary of State Campaign Finance Disclosure

| . Harne | ; | | Report Type | | Expected Date | Antonit | Brent Date | Perpone | Contraction Name | _ |
|--------------------|---|---|----------------------|------|---------------|-------------|------------|---|-------------------------------------|---|
| | RENAISSANCE HOTEL COLUMBUS | 50 N. STD ST COLUMBUS OH 43215 | (JULY) | 2014 | 05/09/2014 | \$28,000.00 | 05/10/2014 | FOOD BEVERAGE FUNDRAISER | RAY C. BLISS BUILDING TRUST FUND | |
| | OHIO REPUBLICAN PARTY FEDERAL ACCOUNT | | SEMIANNUAL (JULY) | 2014 | 05/01/2014 | 00'000'02\$ | | ALLOCATION OF STATE SHARE OF ADMIN EXPENSES | RAY C. BLISS BUILDING TRUST FUND | |
| | FACTGEM | 2000 AUBURN GRIVE, SUITE 330 BEACHWOOD OH 44122 | SEMINANUAL | 2014 | 63/20/2014 | \$15,000.00 | | COMPUTER SOFTWARE | RAY C. BLISS BULDING TRUST FUND | |
| | OHIO REPUBLICAN PARTY FEDERAL ACCOUNT | 211 SOUTH FIFTH STREET COLUMBUS OH 43215 | (JULY) | 2014 | D4/28/2014 | \$12,708.00 | | STATE SHARE OF ADMIN EXPENSES | RAY C. BLISS BUILDING TRUST FUND | |
| | UBLICAN EDERAL | 211 SOUTH FIFTH STREET COLUMBUS OH 43215 | SEMINANUAL (JULY) | 2014 | 06/19/2014 | \$11,500.00 | | ALLOCATION STATE SHARE PROPERTY TAX | RAY C. BLISS BUILDING TRUST FUND | |
| | FACTGEM | 2000 ALIBURN DRIVE, SUITE 330 BEACHWOOD OH 44122 | | 2014 | 03/11/2014 | \$10,000,00 | | SOFTWARE | RAY C. BLISS BUILDING TRUST FUND | |
| | AMERICAN EXPRESS | PO BOX 0001 LOS ANGELES CA 80096 | SEMIANNUAL (JULY) | 2014 | . p4222014 | \$7,184.08 | | CREDIT CARD PAYMENT | RAY C. BLISS BUILDING TRUST FUND | |
| MCCNULTY, JENNA | 1 | 401 HOLLAND LANE, #1419 ALEXANDRIA VA 22314 | SEMIANNUAL (JULY) | 2014 | 03/24/2014 | se,000,00 | | FUNDRAISING CONSULTANT | RAY C. BLISS BUILDING TRUST FUND | |
| SIMA, AMANDA | | 1316 OAKHILL RD BLACKLICK OH 43004 | SEMIANNUAL (JULY) | 2014 | 03/24/2014 | \$6,000.00 | | FUNDRAISING | RAY C. BLISS BUILDING TRUST FUND | |
| | RENAISSANCE HOTEL COLUMBUS | SO N. 3TD ST COLUMBUS OH 43215 | SEMIANNUAL (JULY) | 2014 | 05/29/2014 | \$5,579.06 | 05/10/2014 | FOOD BEVERAGE FUNDRAISER | RAY C. BLISS BUILDING TRUST FUND | |
| | NEOPUNDS BY | P.O. BOX 30193 TAMPA FL 33830 | SEMIANNUAL (JULY) | 2014 | 03/28/2014 | \$3,500.00 | | POSTAGE MACHINE/POSTAGE | RAY C. BLISS BUILDING TRUST FUND | |
| | PREFERRED COMMUNICATIONS | 815 KING ST., SUITE 208 ALEXANDRIA VA 22314 | SEMIANNUAL (JULY) | 2014 | 03/14/2014 | \$2,875,00 | | FUNDRAISING LIST | RAY C, BLISS BUILDING TRUST FUND | |
| | AASTER | 4289 SAWYER RD COLUMBUS OH 43238. | SEMIANNUAL (JULY) | 2014 | 03/27/2014 | \$1,764.00 | | POSTAGE DIRECT MAIL | RAY C. BLISS BUILDING TRUST FUND | |
| | | | SEMIANNUAL (JULY) | 2014 | 01/07/2014 | \$1,708.71 | | PHONES | RAY C. BLISS BUILDING TRUST FUND | |
| | CITY WIDE MAINTENANCE OF COLUMBUS | 6415 E, LIVINGSTON AVE. STE. E COLUMBUS OH 43068 | SEMIANNUAL (JULY) | 2014 | 01/07/2014 | \$1,521.62 | | JANITORIAL SERVICES | RAY C. BLISS BUILDING TRUST FUND | |

| | And the state of t | Address | Bornett Tone | Vent | - Function Date | Amount | - Event Ords | Purposa | Committee Name |
|----------------------|--|---|--------------|------|-----------------|-------------|--------------|---------------------------------|---|
| | ٠ | 1780 SEQUOIA VISTA CIRCLE SALT LAKE CITY UT 84104 | PRE-PRIMARY | 2014 | 01/20/2014 | \$20,254.80 | | WEBSITE DEVELOPMENT | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | OHIO REPUBLICAN PARTY FEDERAL ACCOUNT | 211 S FIFTH STREET COLUMBUS OH 43215 | PRE-PRIMARY | 2014 | 01/31/2014 | \$14,000.00 | | | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | | 373 SOUTH HIGH STREET, 17TH FLOOR COLUMBUS OH 42215 | PRE-PRIMARY | 2014 | 01/20/2014 | \$13,684.21 | | | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | OHIO REPUBLICAN PARTY FEDERAL ACCOUNT | 211 S FIFTH STREET COLUMBUS OH 43215 | PRE-PRIMARY | 2014 | 12/12/2013 | \$13,000.00 | | OF | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| GUTHRIE, SCOTT | | 1833 BURKE ST SE WASHINGTON DC 20003 | PRE-PRIMARY | 2014 | 03/10/2014 | \$10,000,00 | | | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | CAPITOL CONTENDER | 274 S THIRD COLUMBUS OH 43215 | PRE-PRIMARY | 2014 | 03/04/2014 | \$8,000.00 | | PORT | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | OXFORD COMMUNICATIONS | PO BOX 1214 ALEXANDRIA VA 22313 | PRE-PRIMARY | 2014 | 01/20/2014 | 87,775.00 | | | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| BODNEY MS. BROOKE | | 685 CITY PARK AVE COLUMBUS OH 43208 | PRE-PRIMARY | 2014 | 03/10/2014 | 87,500,00 | , | | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | NEACE & ASSOCIATES INSURANCE AGENCY OF OHIO | BBS CENTRAL AVENUE CINCINNATI OH 45202 | PRE-PRIMARY | 2014 | 01/20/2014 | \$7,425,00 | | MIC | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | OHIO REPUBLICAN PARTY FEDERAL ACCOUNT | 211 S FIFTH STREET COLUMBUS OH 43215 | PRE-PRIMARY | 2014 | 12/12/2013 | \$7,055.39 | | SE | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | KERSCHNER CONSULTING LTD | 510 HEDGEGATE N TIFFIN OH 44883 | PRE-PRIMARY | 2014 | 03/04/2014 | \$6,500.00 | | | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | FACTGEM | 2000 AUBURN DRIVVE, SUITE 330 BEACHWOOD OH 44122 | PRE-PRIMARY | 2014 | 93/11/2014 | 00'000'5\$ | | 2 | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | CANDLECOACH | 4119 GRAND DR NW CANTON OH 44708 | PRE-PRIMARY | 2014 | 02/03/2014 | \$4,650.00 | | MOTOR COACH TO DC | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | OHIO REPUBLICAN PARTY FEDERAL ACCOUNT | 211 S FIFTH STREET COLUMBUS OH 43215 | PRE-PRIMARY | 2014 | 03/04/2014 | \$4,578.45 | | ALLOCATION OF ADMIN EXPENSES | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | OHIO REPUBLICAN PARTY FEDERAL ACCOUNT | 211 S FIFTH STREET COLUMBUS OH 43215 | PRE-PRIMARY | 2014 | 02/04/2014 | \$4,500,00 | | ALLOCATION OF ADMIN EXPENSES | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | | 211 S PIFTH STREET COLUMBUS OH 43215 | PRE-PRIMARY | 2014 | 01/15/2014 | \$4,500.00 | | ALLOCATION OF ADMIN EXPENSES | OHIO NEPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE ACCOUNT |
| | OHIO REPUBLICAN PARTY FEDERAL ACCOUNT | 211 S FIFTH STREET COLUMBUS OH 43215 | PRE-PRIMARY | 2014 | 04/11/2014 | \$4,310.97 | | ALLOCATION OF ADMIN EXPENSES | OHIO REPUBLICAN STATE CENTRAL AND EXECUTIVE COMMITTEE STATE |

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